

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**ALEXANDER E. JONES**

**Debtor.**




## Chapter 7

**Case No. 22-33553 (CML)**

**CHRISTOPHER R. MURRAY,  
CHAPTER 7 TRUSTEE  
Plaintiff,**

**V.**

**RCGJ, LLC AND DAVID R. JONES, AS  
TRUSTEE OF THE ALEXANDER E. JONES  
DESCENDANT AND BENEFICIARY TRUST  
Defendants.**

**Adv. No. 25-03420**

**LIMITED RESPONSE TO WITHDRAWAL OF THE REFERENCE  
AND RESERVATION OF RIGHTS  
(Relates to Docket No. 9)**

RCGJ, LLC and David R. Jones (the “*Defendants*”) included a one-paragraph, purported motion to withdraw the reference in the answer. Docket No. 9, ¶ 54. To the extent the Defendants have made a proper motion for withdrawal of the reference, the Trustee acknowledges there are some causes of action in the Complaint (Docket No. 1) that, at the time of trial, would entitle the Defendants to a trial by jury. Withdrawal of the reference would be appropriate at that point. The Trustee does not oppose retention of pretrial matters by the bankruptcy court. The Trustee reserves all rights to amend or supplement this response.

Dated: September 5, 2025  
Houston, Texas

Respectfully submitted,

By: /s/ Erin E. Jones  
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**Counsel for Christopher R. Murray, Chapter  
7 Trustee**

**CERTIFICATE OF SERVICE**

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on September 5, 2025.

/s/ Erin E. Jones  
Erin E. Jones